

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**NO. 3:15-cr-00037  
Judge Campbell**

[1] **DONALD DUANE BUCHANAN, JR.** )  
a/k/a “DONALD GAINS” )  
a/k/a “RAY RHODES” )  
[2] **BENJAMIN EDWARD HENRY BRADLEY** )  
[3] **FELICIA ANN JONES** )  
a/k/a “AUNTIE” )  
[4] **PAMELA O’NEAL** )  
[5] **BERNADETTE BRADLEY** )  
a/k/a “BERNADETTE NICHOLE COLLEY”) )  
[6] **GENE ROLAND HARDWICK** )  
[7] **HOWARD BRONS III** )  
[8] **ASHLEY KAYE ALDRIDGE** )  
[9] **ANDREW BRADLEY FROOME** )  
[10] **JAMES EDWARD JOHNSON II** )  
a/k/a “RED” )  
[11] **BOBBY DEANDRAE ROBERTSON** )  
a/k/a “B.O.” )  
[12] **JONATHAN LAMAR MOORE** )  
a/k/a “J-BOY” )  
[13] **ROBERT EDWIN HAMPTON** )  
[14] **ERIC ANTHONY MCEWEN** )  
a/k/a “E” )  
[15] **TONY WADE HOLBROOKS** )  
[16] **KAI ELIJAH RAMOS** )  
[17] **WALTER THOMAS BOWEN, JR.** )  
[18] **FRANK JEFFREY KELLY, JR.** )  
a/k/a “LITTLE MAN” )

**BILL OF PARTICULARS FOR FORFEITURE OF REAL PROPERTY**

The United States of America, by and through David Rivera, United States Attorney for the Middle District of Tennessee, and Cecil VanDevender, Assistant United States Attorney, hereby files the following Bill of Particulars for Forfeiture of Real Property.

In Forfeiture Allegation One, the Indictment seeks forfeiture of the following upon conviction of Count One:

- A. pursuant to Title 21, United States Code, Section 853(a)(1), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of violation of Title 21, United States Code, Section 846, including but not limited to a money judgment in an amount to be determined, representing the amount of gross drug proceeds obtained as a result of such offense; and
- B. pursuant to Title 21, United States Code, Section 853(a)(2), any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

(DE# 3, Indictment, at PageID #: 11-12.)

In Forfeiture Allegation Two, the Indictment seeks forfeiture of the following upon conviction of Count Two:

pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in the violation of 18, United States Code, Section 1956(h) (conspiracy to commit money laundering), or any property traceable to such property including but not limited to proceeds of the violation and including but not limited to a money judgment in an amount to be determined, representing the property involved in a violation of 18, United States Code, Section 1956(h) (conspiracy to commit money laundering), or any property traceable to such property.

(*Id.* at PageID #: 13-14.)

**THE UNITED STATES HEREBY GIVES NOTICE THAT**, in addition to those items sought for forfeiture in the Indictment filed at Docket Entry 3, and those items sought for forfeiture in the Bill of Particulars filed on August 17, 2015 at Docket Entry No. 279, the United States is seeking forfeiture of the following real property as to Forfeiture Allegations One and Two:

- 1. Real property commonly known as 14425 Curtis, Detroit, MI 48235, and more particularly described in the attached Exhibit A to Bill of Particulars for Forfeiture of Real Property (“Exhibit A”).
- 2. Real property commonly known as 14427 Curtis, Detroit, MI 48235, and more particularly described in Exhibit A.

3. Real property commonly known as 16617 Lesure, Detroit, MI 48235, and more particularly described in Exhibit A.
4. Real property commonly known as 15355 Ohio Street, Detroit, MI 48238, and more particularly described in Exhibit A.
5. Real property commonly known as 45669 Harmony Lane, Belleville, MI 48111, and more particularly described in Exhibit A.

Respectfully submitted,

DAVID RIVERA  
United States Attorney  
Middle District of Tennessee

By: s/ Cecil VanDevender  
Cecil VanDevender  
Assistant United States Attorney  
110 Ninth Avenue, South, Suite A-961  
Nashville, Tennessee 37203  
Telephone: 615/736-5151

**CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of May, 2016, a copy of the foregoing Bill of Particulars was filed electronically. Notice of this filing will be sent to all persons registered, by operation of the Court's electronic filing system, as attorneys of record in this case.

s/ Cecil VanDevender  
Cecil VanDevender